

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

KERRY JOHNSON, et al.

\*

Plaintiffs

\*

v.

\*

Civil Action No. 1:06-cv-408

GEICO CASUALTY COMPANY, et al.

\*

Defendants

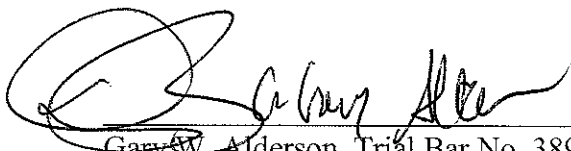
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CLASS ACTION

\* \* \* \* \*

**NOTICE OF RULE 30(B)(6) DEPOSITION DUCES TECUM OF  
FAMILY PRACTICE ASSOCIATES**

PLEASE TAKE NOTICE that pursuant to FED. R. CIV. P. 30(b)(6), the Defendants will take the deposition upon oral examination of the person designated by Family Practice Associates with respect to the topics set forth in Schedule A. The designee shall produce the original documents set forth in Schedule B. The deposition duces tecum will take place on July 15, 2008, commencing at 3:30 p.m., at the offices of LAW OFFICES OF DAWN L. BECKER, 919 N. Market Street, Suite 460, Wilmington, Delaware 19801, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.



Gary W. Alderson, Trial Bar No. 3895  
Dawn L. Becker, Trial Bar No. 2975  
LAW OFFICES OF DAWN L. BECKER  
Citizens Bank Center  
919 N. Market Street  
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Wilmington, Delaware 19801  
302-778-5786  
*Attorneys for Defendants*



George M. Church  
Laura A. Cellucci  
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410-727-6464

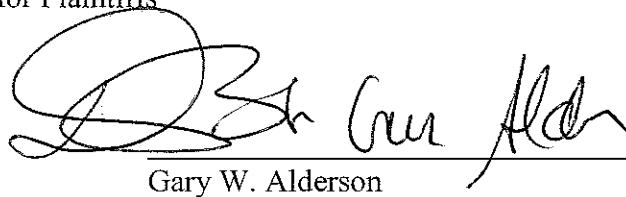
*Attorneys for Defendants  
Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 3<sup>rd</sup> day of June, 2008, a copy of the foregoing  
was mailed, first class mail, postage prepaid, to:

Richard H. Cross, Jr., Esquire  
Christopher P. Simon, Esquire  
CROSS & SIMON, LLC  
913 North Market Street  
11<sup>th</sup> Floor  
P.O. Box 1380  
Wilmington, Delaware 19899-1380

Attorneys for Plaintiffs

A handwritten signature in black ink, appearing to read "Gary W. Alderson", is written over a horizontal line. The signature is stylized and cursive.

Gary W. Alderson

**SCHEDULE A**

**TO:** Family Practice Associates  
1100 S. Broom Street  
Wilmington, Delaware 19805

**The deponent is requested to produce a person or persons who are most knowledgeable about and can testify regarding the matters described below:**

1. The care and treatment rendered to Kerry Johnson, DOB: 8/12/56, between January 1, 2001 and the present.
2. The complete billing and payment history relating to billings, payments, write-offs, write-downs, explanations of benefits, insurance payments, collection efforts or referrals and the entire payment account history for Kerry Johnson, DOB: 8/12/56.
3. The complete history of all medications provided to or prescriptions written for Kerry Johnson between January 1, 2001 and the present.
4. The determination by Family Practice Associates that the office visits of Kerry Johnson on March 11, 2005 and July 21, 2005, were medically necessary and were causally related to Kerry Johnson's motor vehicle accident of July 16, 2004.
5. The manner in which you determine what fee to charge for CPT codes 99211, 99212, 99213, 99214, and 99215 between January 1, 2001 and the present.
6. The method by which you determined the CPT code for which you will charge a patient related to an office visit.
7. Any collection efforts or referrals to collection agencies related to any claim for overdue bills or outstanding balances for Kerry Johnson between January 1, 2001 and the present.

**SCHEDULE B**

**TO:** Family Practice Associates  
1100 S. Broom Street  
Wilmington, Delaware 19805

**DOCUMENTS TO BE PRODUCED**

1. The entire original medical chart for Kerry Johnson.
2. All records related to the complete billing and payment history, including documents related to payments, write-offs, write-downs, Explanations of Benefits, insurance payments, co-pays, collection efforts or referrals for Kerry Johnson.